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May 7, 2021

VIA ECF

The Honorable Madeline Cox Arleo
United States District Judge
for the District of New Jersey

Re: *Reshma Abell v. Pacira Pharmaceuticals, Inc., et al.*
Docket No.: 18-cv-16509 (MCA)(AME)

Dear Judge Cox Arleo:

This Firm represents Defendants Pacira Pharmaceuticals, Inc. (“Pacira”), Rich Kahr, Peter Murphy, and Glenn Reiser, (hereinafter as, “Defendants”) in the above-captioned matter. We write, pursuant to Local Civil Rules 7.2, to respectfully request leave to file excess pages of Defendants’ Summary Judgment Motion filed contemporaneously herewith. As Defendants’ brief is drafted in 12-point font, Defendants respectfully request permission to file a summary judgment brief comprised of five additional pages for a total of thirty-five pages.

The reason for this request is due to the record in this matter being unusually large. In this litigation, Plaintiff set forth four causes of action and through the course of discovery (up until earlier this week when Plaintiff agreed to voluntarily dismiss two individual Defendants (ECF No. 80) pre-summary judgment), this matter proceeded against a corporate Defendant, Pacira, and five individual Defendants. Additionally, during the course of discovery, Defendants conducted a voluminous ESI review. As a result of there being multiple counts and defendants, and voluminous ESI, the parties exchanged approximately 2,600 pages in discovery, and conducted six fact witness depositions comprised of approximately 1100 pages of deposition testimony. Defendants attempted in good faith to comply with the Court’s page limitations but in addressing the multiple claims against four sets of Defendants and in relying on the extensive record evidence, we unfortunately exceeded the number of pages permitted.

In the alternative, if the Court requires that we adhere to the thirty-page limit, we respectfully request that the Court provide us with a two day extension from the date of the order on this foregoing request to comply with these limits. Plaintiff’s counsel had earlier in the week consented to any extension if Defendants so required.



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We thank the Court for its consideration of the foregoing request.

Respectfully submitted,

JACKSON LEWIS P.C.

/s/ James J. Panzini

James J. Panzini

C: All Counsel of Record (via ECF)

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